

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 04-
v. : DATE FILED:
RICHARD THOMAS : VIOLATION:
18 U.S.C. § 287
: (Making false claims - 1 Count)
18 U.S.C. § 2
: (Aiding and abetting)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

From on or about April 7, 1999 through on or about March 15, 2003, in the
Eastern District of Pennsylvania, defendant

RICHARD THOMAS

knowingly made and presented, and aided, abetted, and willfully caused, the making and
presenting, to the Internal Revenue Service, an agency of the United States, claims for fraudulent
tax refunds, by submitting fraudulent IRS Form W-2s (containing false employer, wage, and
withholding information) to various Electronic Return Organizations approved by the Internal
Revenue Service (including H&R Block offices and Jackson-Hewitt offices), knowing those

Electronic Return Organizations would cause claims for fraudulent tax refunds of at least \$278,828 to be made to the Internal Revenue Service.

All in violation of Title 18, United States Code, Sections 287 and 2.

PATRICK L. MEEHAN
United States Attorney